

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

Motion GRANTED conditioned upon the timely filing of a waiver of speedy trial.

UNITED STATES OF AMERICA)
)
)
v.)
)
)
RICHARD HALL BACHMAN)

**No. 3:13-00119-3
JUDGE TRAUGER**

Otto A. Baumgarten

MOTION TO CONTINUE TRIAL
AND EXTEND TIME FOR FILING PRETRIAL MOTIONS

Through counsel, defendant Richard Hall Bachman moves to continue the trial, currently set on October 1, 2013, and to extend the time for filing pretrial motions. Mr. Bachman is released pending trial.

In support of this motion, defense counsel would show the following: As reflected in previous pleadings, the discovery in this matter is extremely voluminous. Defense counsel has received 52 compact discs in an initial discovery disclosure and is at the very beginning stage of reviewing and organizing these materials. The government has advised that it will be sending the discovery to a forensic center for further organization and will share those files as well. The discovery in this case likely will exceed 100,000 pages. Additionally, there are numerous collateral proceedings and documents which must be reviewed as well. Defense counsel needs additional time to organize and review all of these materials before counsel can prepare pretrial motions or prepare for trial.

Mr. Bachman concurs in the request for a continuance, and will be filing a speedy trial waiver.

For the reasons stated above, Mr. Bachman moves to continue the October 1 trial and to extend the time for filing pretrial motions.